BAKER & HOSTETLER LLP

Heather J. McDonald (HM 3320) Robertson D. Beckerlegge (RB 1829) Sydney W. Park (5999404) 45 Rockefeller Plaza New York, New York 10111 Telephone: (212) 589-4200

Facsimile: (212) 589-4201

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BURBERRY LIMITED; GIANNI VERSACE, S.R.L.; HERMÈS INTERNATIONAL; LOUIS VUITTON MALLETIER; and MICHAEL KORS, L.L.C.,

Plaintiffs,

-against-

VARIOUS JOHN DOES, JANE DOES, and XYZ COMPANIES,

Defendants.

MOTION TO FILE ACTION

UNDER SEAL BRANTED, FILE

CLEAR IS DIRECTED FO CLOSE

TITIS CASE

so ordered

MISCELLANEOUS ACTION NO.

24 MC 209

NOTICE OF PLAINTIFFS' EX PARTE MOTION TO FILE ACTION UNDER SEAL

PLEASE TAKE NOTICE that, upon the Declaration of Robertson D. Beckerlegge, Esq., dated May 2, 2024 and copy of the proposed complaint, Plaintiffs Burberry Limited; Gianni Versace, S.r.l.; Hermès International; Louis Vuitton Malletier; and Michael Kors L.L.C. (all collectively, "Plaintiffs"), will move this Court at such time and date as the Court shall direct, for an Order under 15 U.S.C. § 1116(d)(8) requiring the papers in support of Plaintiffs' request for a seizure order to be filed under seal, including but not limited to, the following documents:

- 1. Summons:
- 2. Complaint & Exhibit A;
- 3. Order To Show Cause on Motion for a Temporary Restraining Order, Preliminary Injunction & Seizure Order;

- 4. Plaintiffs' Memorandum of Law in Support of the Order To Show Cause;
- 5. Affidavit of Mr. Raymond Dowd;
- 6. Declaration of Robertson D. Beckerlegge;
- 7. Plaintiffs' Declarations;
- 8. Ancillary Documents: Rule 7.1 Statements; Civil Cover Sheets; and Form AO-120;
- 9. This Notice of Motion, the Declaration of Robertson D. Beckerlegge in Support of this Motion, and the Order Sealing the File; and
- 10. Bond to be issued in this action.

Dated: May 2, 2024

New York, New York

Respectfully Submitted,

BAKER & HOSTETLER LLP

By: Heather J. McDonald (HM 3320)

Robertson D. Beckerlegge (RB 1829)

Sydney W. Park (5999404)

45 Rockefeller Plaza

14th Floor

New York, NY 10111 Tel: (212) 589-4200

Fax: (212) 589-4201

Attorneys for Plaintiffs